

BELLON & MANINGO, LTD.

732 SOUTH SIXTH STREET, SUITE 102

LAS VEGAS, NEVADA 89101

702-452-6299 • 702-452-6298 FAX

BELLON & MANINGO, LTD.
 LANCE A. MANINGO, ESQ.
 Nevada Bar No.: 006405
 732 S. Sixth Street, Suite 102
 Las Vegas, Nevada 89101
 Telephone: (702) 452-6299
 Facsimile: (702) 452-6298
 Email: lam@bellonandmaningo.com
 Attorney for Defendant
 MARC BRATTIN

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,)	
)	2:13-cr-00161-APG-CWH
Plaintiff,)	
)	
vs.)	
)	
MARC BRATTIN,)	
)	
Defendant.)	

UNOPPOSED MOTION TO MODIFY TRAVEL RESTRICTIONS

Defendant, MARC BRATTIN, by and through his attorney, LANCE A. MANINGO, ESQ., of BELLON & MANINGO, LTD., moves this court for an Order to temporarily modify the travel restrictions placed on Mr. Brattin pursuant to the Order Setting Conditions of Release.

////

////

////

////

////

1 This Motion is made and based upon the Points and Authorities herein and the papers
2 and pleadings previously on file in this matter.

3 DATED this 30th day of July, 2013.

4 BELLON & MANINGO, LTD.

5 /s/ Lance A. Maningo

6 By:

7 LANCE A. MANINGO, ESQ.

8 Nevada Bar No.: 006405

9 732 S. Sixth Street, Suite 102

10 Las Vegas, Nevada 89101

11 Attorney for Defendant

12 MARC BRATTIN

13 **POINTS AND AUTHORITIES**

14 1. The Defendant Marc Brattin and his family take an annual family
15 vacation to the Lake Tahoe area every year. While in Lake Tahoe, Mr. Brattin and his family
16 typically spend time in Lake Tahoe in both the State of Nevada and the State of California.

17 2. On May 6, 2013, an Order Setting Conditions of Release was filed. In said
18 Order, condition 8(g) requires that Mr. Brattin abide by the following restrictions on personal
19 association, place of abode - within the District of Nevada. Mr. Brattin has been in
20 compliance with said Order.

21 3. Undersigned counsel contacted AUSA Sarah E. Griswold regarding the
22 planned family vacation and asked if she was agreeable to making a slight modification to the
23 travel restrictions placed on Mr. Brattin. Ms. Griswold indicated that she is not opposed to
24 modifying the current travel restrictions to allow Mr. Brattin and his family to travel to Lake
25 Tahoe in the State of California during his family vacation scheduled for August 3, 2013
26 through September 3, 2013.

6. Counsel respectfully requests that this Court consider the above facts and circumstances and order that the Condition of Release preventing Mr. Brattin from traveling out of the State of Nevada be temporarily modified to allow Mr. Brattin to travel the State of California in the Lake Tahoe area for his scheduled family vacation from August 3, 2013 through September 3, 2013.

By: LANCE A. MANINGO, ESQ.
Attorney for Petitioner
MARC BRATTIN

Dated this 1st day of August, 2013.

Tygg A. Jeen
UNITED STATES MAGISTRATE JUDGE